

FILED

IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* OCTOBER 28, 2022 *
BROOKLYN OFFICE

EDP:NDB/RMP
F. #2022R00883/NY-NYE-865

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

GORAN GOGIC,

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Violate the Maritime Drug Law Enforcement Act)

1. In or about and between May 2018 and July 2019, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the Eastern District of New York and elsewhere, the defendant GORAN GOGIC, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance while on board a vessel subject to the jurisdiction of the United States, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 46, United States Code, Section 70503(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of

Judge Morrison
Magistrate Judge Kuo

INDICTMENT

Cr. No. 22-CR-493
(T. 21, U.S.C., §§ 853(p), 881(a) and
960(b)(1)(B)(ii); T. 28, U.S.C.,
§ 2461(c); T. 46, U.S.C., §§ 70503(a)(1),
70503(b), 70504(b)(2), 70506(a),
70506(b) and 70507(a); T. 18, U.S.C.,
§§ 2, 3238 and 3551 et seq.)

other conspirators reasonably foreseeable to him, was five kilograms or more of a substance containing cocaine.

(Title 46, United States Code, Sections 70506(b), 70506(a), 70503(b) and 70504(b)(2); Title 21, United States Code, Section 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3238 and 3551 et seq.)

COUNT TWO

(Violation of the Maritime Drug Law Enforcement Act –
Approximately 1,437 Kilograms of Cocaine)

2. On or about February 27, 2019, within the extraterritorial jurisdiction of the United States, the Eastern District of New York and elsewhere, the defendant GORAN GOGIC, together with others, while on board a vessel subject to the jurisdiction of the United States, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 46, United States Code, Sections 70503(a)(1), 70506(a), 70503(b) and 70504(b)(2); Title 21, United States Code, Section 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT THREE

(Violation of the Maritime Drug Law Enforcement Act –
Approximately 537 Kilograms of Cocaine)

3. On or about March 18, 2019, within the extraterritorial jurisdiction of the United States and elsewhere, the defendant GORAN GOGIC, together with others, while on board a vessel subject to the jurisdiction of the United States, did knowingly and intentionally

distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 46, United States Code, Sections 70503(a)(1), 70506(a), 70503(b) and 70504(b)(2); Title 21, United States Code, Section 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT FOUR

(Violation of the Maritime Drug Law Enforcement Act –
Approximately 17,956 Kilograms of Cocaine)

4. On or about June 19, 2019, within the extraterritorial jurisdiction of the United States and elsewhere, the defendant GORAN GOGIC, together with others, while on board a vessel subject to the jurisdiction of the United States, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 46, United States Code, Sections 70503(a)(1), 70506(a), 70503(b) and 70504(b)(2); Title 21, United States Code, Section 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 46, United States Code, Section 70507(a), Title 21, United States Code, Section 881(a) and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) all moneys, negotiable instruments, securities and other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of Title 46, United States Code, Section 70503; (b) all proceeds traceable to such an

exchange, and all moneys, negotiable instruments and securities used or intended to be used to facilitate any violation of Title 46, United States Code, Section 70503; and (c) all conveyances, including aircraft, vehicles and vessels, which were used, or were intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession or concealment of, property as described in Title 21, United States Code, Sections 881(a)(1), 881(a)(2) or 881(a)(9).

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

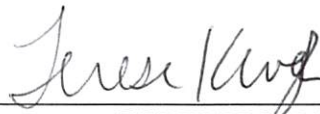
without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other

property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(p) and 881(a); Title 28, United States Code, Section 2461(c); Title 46, United States Code, Section 70507(a))

A TRUE BILL

A handwritten signature in cursive script, appearing to read "Terence King", written over a horizontal line.

FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2022R00883/NY-NYE-865
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

GORAN GOGIC,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 853(p), 881(a) and 960(b)(1)(B)(ii); T. 28, U.S.C.,
§ 2461(c); T. 46, U.S.C., §§ 70503(a)(1), 70503(b), 70504(b)(2),
70506(a), 70506(b) and 70507(a); T. 18, U.S.C., §§ 2, 3238 and
3551 et seq.)

A true bill.

Erise Krog

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

*Nomi Berenson and Robert Pollack,
Assistant U.S. Attorneys (718) 254-7000*